

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RUDOLPH WHITE; ROBERT COX; KENLEY
EXUME; LESLIE GOOD; GIUSEPPE BARLETTA;
COMMONWEALTH SECOND AMENDMENT,
INC.; FIREARMS POLICY COALITION, INC. and
SECOND AMENDMENT FOUNDATION,

Plaintiffs,

-against-

MICHAEL COX, in his official capacity as police commissioner of the city of Boston,

Defendant.

Civil Action No.
1:23-cv-12031-IT

JOINT STATEMENT

Pursuant to Local Rule 16.1(d), and in accordance with the Court's Notice of Scheduling Conference, the parties submit the following Joint Statement Information and the attached proposed Schedule:

1. The parties have appended a proposed joint discovery plan that proposes an expedited discovery schedule.
2. The parties' proposed schedule proposes a deadline of six months for summary judgment motions, but there is a significant chance that Plaintiffs will move for a preliminary injunction prior to that date. In addition, Plaintiffs intend to amend their complaint (to bring in additional individuals with pending license applications as parties), but the parties do not anticipate this requiring the Court's intervention.
3. There are no pending motions.
4. Other than the timing of a preliminary injunction motion, as referenced above, there do not appear to be any other issues that need to be discussed at the scheduling conference.

Dated: February 23, 2024

Respectfully submitted,

THE PLAINTIFFS,

By their attorneys,

/s/ David D. Jensen

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THE DEFENDANT,

By his attorney,

/s/ James J. Megee

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on Feb. 23, 2024.

/s/ David D. Jensen

David D. Jensen